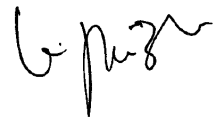


Palani Karupaiyan et al	UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK
Vs	
Experis US Inc et al	Docket# 21-Cv-4675-LGS

**Notice of  
Motion to request for Permanent injunctions  
and Declarative orders thru Summary Judgment**

PLEASE TAKE NOTICE that upon the annexed affidavit or affirmation Palani Karupaiyan sworn to or affirmed Jan 10 2018 ~~and upon the complaint herein~~, plaintiff will move this Court, \_\_\_ Judge), U.S.D.J., in room\_\_\_, United States Courthouse, 500 Pearl St, New York, NY 10007, on the \_\_\_ (day) day of \_\_\_ (Month) , 20 , at (time) or as soon thereafter as counsel/pro se can be heard, for an order pursuant to Rule\_\_\_ of the Federal Rules of Civil Procedure granting for

**Motion to request for Permanent injunctions  
and Declarative orders thru Summary Judgment**



Dated: Apr 18 2022

Place

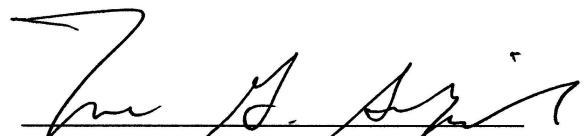
Signature

Palani Karupaiyan  
212 470 2048(m)  
palanikay@gmail.com

Application **DENIED without prejudice**. In response to the amended complaint, Defendants timely filed a motion to dismiss -- which can be filed in lieu of filing an answer to the amended complaint. That motion is now fully briefed. Plaintiff's instant motion, which appears premised on Defendants' untimely response to the amended complaint, is therefore denied. If any claims in the amended complaint survive the Court's decision on Defendants' pending motion to dismiss, either party may file premotion letters in anticipation of a summary judgment motion after the close of discovery.

The Clerk of Court is respectfully directed to close the motion at Dkt. No. 47 and to mail a copy of this Order to Plaintiff, who is proceeding pro se.

Dated: April 25, 2022  
New York, New York

  
**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

Palani Karupaiyan et al	UNITED STATES DISTRICT COURT
Vs	SOUTHERN DISTRICT OF NEW YORK
Experis US Inc et al	Docket# 21-Cv-4675-LGS

**AFFIDAVIT/AFFIRMATION IN SUPPORT OF MOTION**

## **AFFIDAVIT/AFFIRMATION**

I, Palani Karupaiyan , [BEING DULY SWORN] deposes and says [or: makes the following affirmation under the penalties of perjury]:

I, Palani Karupaiyan, am the plaintiff in the above- Palani Karupaiyan , entitled action, and respectfully move this Court to issue an order

**Motion to request for Permanent injunctions and Declarative orders thru Summary Judgment**

(state what you are seeking)

The reason why I am entitled to the relief I seek is the following:

- 1) Plaintiff filed complaint on May 25 2021 and filed amended complaint on Jan 25 2022 (ECF-34) and served the complaint timely Ecf-34.
- 2) Apr 5 2022, ECF-44, Defendants Experis US Inc, ManpowerGroup US Inc, Jonas Prising, and Samantha Moore.

This appearance is late appearance. Because of late appearance, plaintiff(s) were entitled to default judgement against the defendants for their all prayers.

- 3) When the Govt is beneficiary, 4 factor analysis for permanent injunctions requests were not needed.

See, *In United States v. Richard Haraka alias RICK BRYAN, d/b/a TAXGATE* , Dist court, NJ div, 02-5340(JAP), (Haraka)docket does not have any motion for permanent injunction with 4 factor analysis, there is a permanent injunction order entered Mar 31 2003 for the best interest of the Nation.

Also when this defendants appeared late and so plaintiffs entitled to all prayer by default.

- 4) In Bontkowski v. Smith, 305 F. 3d 757 - USCA, 7th Cir. 2002 @761-762, "Whether he had standing to obtain a declaratory judgment, Tobin for Governor v. Illinois State Bd. of Elections, 268 F.3d 517, 528 (7th Cir.2001); Perry v. Sheahan, 222F.3d 309, 313-14 (7th Cir. 2000); Malowney v. Federal Collection Deposit Group, 193 F.3d 1342, 1347-48(11th Cir.1999), however, will require us to consider briefly the various purposes for which such relief can besought. One is as a prelude or substitute for injunctive relief, Original Great American Chocolate ChipCookie Co. v. River Valley Cookies, Ltd., 970 F.2d 273, 276 (7th Cir.1992);. In Bontkowski@762 "can be interpreted as a request for the imposition of such a trust, a form of equitable relief and thus a cousin to an injunction. Rule 54(c), which provides that a prevailing party may obtain any relief to which he's entitled even if he "has not demanded such relief in [his] pleadings." See Holt Civic Club v. City of Tuscaloosa, 439U.S. 60, 65-66, 99 S.Ct. 383, 58 L.Ed.2d 292 (1978);
- 5) In Wise v. US, Dist. Court, D. South Carolina 2009 "Declaratory judgments, however, are meant to define the legal rights and obligations of the parties in the anticipation of some future conduct."
- 6) In Boyer v. CLEARFIELD COUNTY INDU. DEVEL. AUTHORITY, Dist. Court, WD Penn 2021 "Thus a prayer for an accounting, like a request for injunctive relief, is not a cause of action or a claim upon which relief can be granted. Rather, it is a request for another form of **equitable relief**, i.e., a "demand for judgment for the relief the pleader seeks" under Rule 8(a)(3) of the Federal Rules of Civil Procedure. Đ\*\*\*\*As such, it too is not the proper subject of a Rule 12(b)(6) motion. Đ\*\*\*Global Arena, LLC, 2016 WL 7156396, at \*2; see also Bontkowskiv. Smith, 305 F.3d 757, 762 (7th Cir. 2002).

Permanent injunctions against the defendants for

- 1) **Defendants should not discriminated US citizenship in defendants' employees or applicants for employment; Unlawful favoring foreigner against US citizen in fulltime/contract job**

Because discrimination against the US citizen is equal to discrimination against US. The US citizens were foundation of the nation.

Because of foreigner employee favor the defendants in matter of corrupt business practice, outsource against the US, foreigner employees helps the defendants to outsource the job so the defendants should able to tax evade against the US and its states.

- 2) **Defendants should not outsourcing/ offshoring USA jobs**

**Because the purpose to tax including Payroll tax evade against US and its states, pay the tax evaded money to US corporate officers**

- 3) **Defendants should not access H1,L1, B1 work permit visa(s) from Dept of Labor and/or United States Citizenship and Immigration Services**

because the defendants use these Visas to discriminate the US citizens in employment, use these visas against US in tax evasion, and outsource against US.

- 4) **Rebound/insource the projects to US from outside of USA**

because the defendants use these Visas to discriminate the US citizens in employment, use these visas against US in tax evasion, and outsource against US.

**5) Defendant should not help/encourage the US corporate to outsource the projects outside of USA**

because the defendants use these Visas to discriminate the US citizens in employment, use these visas against US in tax evasion, and outsource against US.

**Declarative order**

**6) Order the defendants to deposit/pay to US Treasury 3 times amount they Send out of USA to offshoring the jobs outside of United States since past 20 years. Until this money deposited, this court should lock Ms Moore and, Mr Jonas Prising in Jail. Same amount of money send out to offshore the American jobs the Experis/defendants should pay to the plaintiff**

These outsourced jobs were sent out without Dept of Labor certification and for the purpose of tax evasion, money laundering against US. the Foreigner to do/work on the US based Job which need Dept of Labor certification. These defendants outsource the US/American Jobs with Dept of Labor certification for the purpose of tax evasion, money laundering against the US.

**7) Declarative order to transfer all ManpowerGroup Inc stocks into US treasury because of Payroll tax evasion, money laundering by Experis/US corps with help of Experis.**

The ManpowerGroup Inc is listed as MAN in NYSE (New York Stock Exchange) and valued 5.4 billion USD.

Because of defendants did activities Tax evasion and money laundering against United States, this court should order the all the ManpowerGroup's stock transfer into US treasury.

- 8) Declarative order to transfer the ownership of ManpowerGroup Inc and its sister companies including Experis to the plaintiff Karupaiyan who will appoint operating officers, run the business and pay all the past taxes due by ManpowerGroup and its sister companies to US.
- 9) Plaintiffs pray this court for following relief (money ) i from the Experis defendants for their wrong doings (Experis, ManPowergroup, [Jonas Prising](#), [Samanta Moore](#))

Count	in Million \$
1 Age discrimination	150
2 color distrimination	100
3 corruption and bribe	100
4 disability discrimination	100
5 dishonoring court order	100
6 disposal evidence	100
7 Intentional Emotional distress	100
8 failure to Hire	100
9 failure to accommodate disability	100
10 fraud	100
11 Favoring foreigner against the US citizen in employment	100
12 gender discrimination	100
13 genetic discrimination	100
14 National origin discrimination	100
15 Payroll tax evasion/ Money laundering	100
16 Racial discrimination	100
17 Religious Discrimination	100
18 Retaliation	100
19 Unequal terms and conditions, Less well treatment	100
20 Unjust enrichment	100
22 US citizenship Discrimination	100
23 Violation of damaging income, loss of income, causing unemployment, Loss of Income- Present, future	100

Children

	Benefited/Taken child support money/Unjust enrichment by child	
21	support money	100
	Plaintiffs time, effort, pain suffering, expense	15

**Total in Millions** **2365**

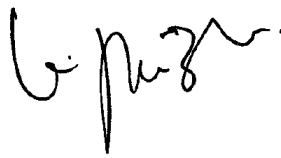
- 10) **Plaintiffs prays this court for 29% interest on their claim since Oct 2017. Plaintiff Palani Karupaiyan paid child support using credit card which charged 29% interest.**
- 11) Plaintiffs pray this court for jailing Samantha Moore and Jonas Prising for 5 years for contempt of court.
- 12) For any and all reason stated plaintiff pray this court for his injunctive orders, declarative orders thru his summary judgement to be granted.
- 13) Also Plaintiff praying for any and all benefit plaintiff entitled.

WHEREFORE, I respectfully request that the Court grant the within motion, as well as such other and further relief that may be just and proper. Use this format below if preparing an affidavit (requires a notary public)  
Sworn to me before this day of \_\_\_\_\_, 20 Your name :Notary Public

**OR:**

WHEREFORE, I respectfully request that the Court grant the within motion, as well as such other and further relief that may be just and proper. Use this format below if preparing an affirmation

I declare under penalty of perjury that the foregoing is true and correct.



Executed on Apr 21 2022

Your Signature  
Palani Karupaiyan

**Affirmation of Service thru ecf.**